

LEGAL NOTICE OF FILING OF
PETITION FOR CONTESTED CASE
BEFORE THE BOARD OF ENVIRONMENTAL QUALITY

On October 24, 2006 Tim Gordon and Michael Ashby, residents of Kuna, Idaho, filed a Petition for Contested Case Hearing and Administrative Appeal with the Board of Environmental Quality (Board). Mr. Gordon and Mr. Ashby are seeking Board review of the permit to construct issued by the Department of Environmental Quality to the Fiberglass Systems, Inc. facility located in Kuna, Idaho on September 19, 2006.

The Rules of Administrative Procedure Before the Board of Environmental Quality, IDAPA 58.01.23, allow persons who claim a direct and substantial interest in the proceeding to file a petition with the Board for an order granting intervention to become a party. **Pursuant to IDAPA 58.01.23.352.01, petitions to intervene must be filed with the Hearing Coordinator within fourteen (14) days of the publication date of this notice.**

Copies of the documents filed in this contested case can be obtained by contacting Paula Wilson, Hearing Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706, (208)373-0418.

This legal notice will appear in the Idaho Statesman on Tuesday, October 31, 2006



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050035

FACILITY ID No.: 001-00179

AQCR: 64

CLASS: A

SIC: 3079

ZONE: 11

UTM COORDINATE (km): 548.3, 4814.4

1. PERMITTEE

Fiberglass Systems Inc.

2. PROJECT

Permit to Construct Revision

3. MAILING ADDRESS

4545 Enterprise St.

CITY

Boise

STATE

ID

ZIP

83705

4. FACILITY CONTACT

Ray Yehle

TITLE

Director of Regulatory Affairs

TELEPHONE

(208) 342-6823 ext. 237

5. RESPONSIBLE OFFICIAL

Gary Multanen

TITLE

Owner/CEO

TELEPHONE

(208) 342-6823, ext. 236

6. EXACT PLANT LOCATION

Block 2, Lot 4, Swan Falls Business Park, Kuna, Idaho

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Fabrication of Fiberglass Reinforced Plastic Composites

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: September 19, 2006

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CO	carbon monoxide
CR	corrosion resistant
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
HS	high strength
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu	million British thermal units
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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Location:	Kuna, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 This permit to construct (PTC) revision allows the facility to exhaust emission from three separate exhaust stacks instead of one stack. Emissions do not increase as a result of this revision. This PTC also incorporates 40 CFR 63, Subpart WWWW.
- 1.2 This PTC replaces PTC No. P-000719, issued on May 17, 2002, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Coatings applications during fabrication of fiberglass reinforced plastics. Emissions from application process exhaust to Stack EF-1.	Purolator FACET-Aire 3, 1-inch fiberglass filter (72% efficiency); and Purolator 1172 BWL, fiberglass bulk media filter (84% efficiency)

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2. STACKS EF-1, EF-2, EF-3**2.1 Process Description**

Fabrication of fiberglass reinforced plastics at the permittee's facility involves application of a variety of gel coats, resins, and other materials. These materials are applied in one of 12 spray booths using spray guns. The spray booths exhaust to the atmosphere through Stacks EF-1, EF-2, and EF-3.

2.2 Emissions Control Description

Each spray booth exhausts through a series of two filters to Stacks EF-1, EF-2, and EF-3. The exhaust from each booth first passes through a Purolator FACET-Aire 3, 1-inch fiberglass filter (collection efficiency rated at 72%), and then through a Purolator 1172 BWL, fiberglass bulk media filter (collection efficiency rated at 84%).

Emissions Limits**2.3 Emissions Limits**

Total emissions of particulate matter (PM), PM₁₀, individual and total volatile organic compounds (VOCs), and the toxic air pollutants styrene, methylene chloride, and methyl ethyl ketone peroxide (MEKP) from Stacks EF-1, EF-2, and EF-3 shall not exceed any corresponding emission limit listed in Table 2.1 and Permit Condition 2.4.

Table 2.1 EMISSIONS LIMITS

Pollutant	lb/hr	T/yr
PM	2.0	8.8
PM ₁₀	2.0	8.8
Total VOCs		245
Styrene (HAP)	175	227
Methyl ethyl ketone peroxide (HAP)	1.6	7.0
Methylene chloride(HAP)		0.079

2.4 HAP Emissions Limit

- Organic HAP emission limit of open molding non-CR/HS operations that use manual resin application shall not exceed a consecutive 12-month average of 5 lb/ton.
- Organic HAP emission limit of open molding tooling operations that use manual resin application shall not exceed a consecutive 12-month average of 8 lb/ton.
- Organic HAP emission limit of open molding low flame spread/low-smoke product operations that use manual resin application shall not exceed a consecutive 12-month average of 12 lb/ton.
- Organic HAP emission limit of open molding shrinkage controlled resins operations that use manual resin application shall not exceed a consecutive 12-month average of 9 lb/ton.
- Organic HAP emissions limit of open mold gel coat operations that use tooling gel coating shall not exceed a consecutive 12-month average of 22 lb/ton. This limit is for spray application of gel coat.

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- Organic HAP emissions limit of open mold gel coat operations that use white/off white pigmented gel coating shall not exceed a consecutive 12-month average of 22 lb/ton. This limit is for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If the permittee only applies gel coat with manual application, the permittee must treat the manually applied gel coat as if it were applied with atomized spray for compliance determinations.
- Organic HAP emission limit of open mold gel coat operations that use all other pigmented gel coating shall not exceed a consecutive 12-month average of 9 lb/ton. This limit is for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If the permittee only applies gel coat with manual application, the permittee must treat the manually applied gel coat as if it were applied with atomized spray for compliance determinations.

[40 CFR 63.5805; 40 CFR 63, Subpart WWWW, Table 5]

2.5 Opacity Limit

Emissions from the Stacks EF-1, EF-2, or EF-3, or any other stack, vent, or functionally equivalent opening associated with the coating application process, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.6 Fugitive Emissions

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Fugitive emissions shall be determined by Environmental Protection Agency Reference Method 22, as described in 40 CFR Part 60, Appendix A or a DEQ-approved alternative method.

2.7 Odorous Emissions

Odorous gases shall not be emitted to the atmosphere in such quantities as to cause air pollution, as required by IDAPA 58.01.01.775.

Operating Requirements

2.8 Fuel-burning Equipment

The permittee shall burn natural gas exclusively in the fuel-burning equipment at this facility.

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2.9 Mixing Room

The door to the mixing tank room shall remain closed while extenders and fillers are being added to the resin matrix.

2.10 Spray Gun and Filter Specifications

- Low-pressure spray guns shall be used throughout the facility for gel-coat applications. The spray guns used at the facility shall be Magnum Venus models TRT-1000 with 5017 or 7017 tip sizes, IDT 3500 MCC with 960 tips, or equivalent spray guns and tips demonstrated to produce similar volumes, pressures, and emissions.
- Spray booths shall be equipped with a Purolator FACET-Aire 3, 1-inch fiberglass filter (collection efficiency of 72% for PM₁₀) and a Purolator 1172 BWL, fiberglass bulk media filter (collection efficiency rated at 84% for PM₁₀), or filters with equivalent or greater collection efficiencies.

2.11 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

Options For Meeting The Standards For Open Molding And Centrifugal Casting Operations

- 2.12 The permittee shall demonstrate that the individual resin or gel coat, as applied, meets the applicable emission limit in Permit Condition 2.4 using one of the following methods in Permit Conditions 2.13 through 2.25.

[40 CFR 63.5810(a)]

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- 2.13 Calculate the actual organic HAP emissions factor for each different process stream within each operation type listed in Permit Condition 2.4. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee must calculate organic HAP emissions factors for each different process stream by using the following equation for materials with less than 33% organic HAP (19% organic HAP for nonatomized gel coat):

$$EF, (\text{lbs/ton}) = 0.107 * \%HAP * 2000 \quad (\text{Eq. 1})$$

The permittee must calculate organic HAP emissions factors for each different process stream by using the following equation for materials with more than 33% organic HAP (19% organic HAP for nonatomized gel coat):

$$EF, (\text{lbs/ton}) = ((0.157 * \%HAP) - 0.0165) * 2000 \quad (\text{Eq. 2})$$

[40 CFR 63.5810(a)(1)]

- 2.14 If the calculated emission factor is less than or equal to the appropriate emission limit, the permittee has demonstrated that this process stream complies with the emission limit in Table 3 in 40 CFR 63, Subpart WWW. It is not necessary that all process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat used, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in Permit Conditions 2.15 through 2.22, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

[40 CFR 63.5810(a)(2)]

- 2.15 The permittee shall demonstrate that on average that it meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type in Permit Condition 2.4 that applies to it.

[40 CFR 63.5810(b)]

- 2.16 Group the process streams described in Permit Condition 2.13 by operation type and resin application method or gel coat type listed in Table 3 of 40 CFR 63, Subpart WWW and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in Permit Condition 2.13 and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 below.

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$$\text{Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 2})$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i , lbs/ton;
 Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons;
 n = number of process streams where the permittee calculated an organic HAP emissions factor.

[40 CFR 63.5810(b)(1)(i)]

- 2.17 The permittee shall compare each organic HAP emissions factor calculated in Permit Condition 2.16 with organic HAP emissions limit in Permit Condition 2.4. The permittee shall demonstrate compliance if all emissions factors are equal to or less than their corresponding emission limits.

[40 CFR 63.5810(b)(2)]

- 2.18 The permittee shall demonstrate each month that it meets each weighted average of the organic HAP emissions limits in Permit Condition 2.4 that apply. When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations.

[40 CFR 63.5810(c)]

- 2.19 Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for the facility for the last 12-month period to determine the organic HAP emissions limit the permittee must meet. To do this, multiply the individual organic HAP emissions limits in Permit Condition 2.4 for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 below.

$$\text{Weighted Average Emissions Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i = organic HAP emissions limit for operation type i , lbs/ton from Permit Condition 2.4;
 Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons;
 n = number of process streams where the permittee calculated an organic HAP emissions factor.

[40 CFR 63.5810(c)(1)]

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- 2.20 Each month calculate the weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in Permit Condition 2.16 and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 below.

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation EF}_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EFi = Actual organic HAP emissions factor for operation type i, lbs/ton;
 Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;
 n = number of process streams where the permittee calculated an organic HAP emissions factor.

[40 CFR 63.5810(c)(2)]

- 2.21 The permittee shall meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling.

[40 CFR 63.5810(d)]

- 2.22 For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, the permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the following resin application methods: manual resin application, mechanical resin application, filament application, or centrifugal casting. The permittee shall not exceed a resin weight of 45 percent organic HAP content, or weighted average weight content for non-CR/HS resin types and filament application methods, and non-CR/HS mechanical application. If the resin organic HAP content is below the applicable value shown in Table 7 of 40 CFR 63, Subpart WWW, the resin is in compliance

[40 CFR 63.5810(d)(1)]

- 2.23 The permittee may also use a weighted average organic HAP content for each application method described in Permit Condition 2.22. The permittee shall calculate the weighted average organic HAP content monthly. The permittee shall use Equation 2 in Permit Condition 2.16 except substitute organic HAP content for organic HAP emissions factor. The permittee is in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 of 40 CFR 63, Subpart WWW.

[40 CFR 63.5810(d)(2)]

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- 2.24 The permittee shall simultaneously use the averaging provisions in Permit Conditions 2.16 through 2.20 to demonstrate compliance for any operations and/or resins the permittee does not include in the compliance demonstrations in Permit Conditions 2.22 and 2.23. However, any resins for which the permittee claims compliance under the option in Permit Conditions 2.22 and 2.23 may not be included in any of the averaging calculations described in Permit Conditions 2.16 through 2.20.

[40 CFR 63.5810(d)(3)]

- 2.25 The permittee does not have to keep records of resin use for any of the individual resins where the permittee demonstrate compliance under the option in Permit Condition 2.22 unless the permittee elects to include that resin in the averaging calculations described in Permit Condition 2.23.

[40 CFR 63.5810(d)(4)]

- 2.26 The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[40 CFR 63.5805(b); 40 CFR 63, Subpart WWWW, Table 4, Condition 2]

- 2.27 The permittee shall keep containers that store HAP- containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

[40 CFR 63.5805(b); 40 CFR 63, Subpart WWWW, Table 4, Condition 3]

- 2.28 The permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. The permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

[40 CFR 63.5805(b); 40 CFR 63, Subpart WWWW, Table 4, Conditions 6 – 8]

- 2.29 Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

[40 CFR 63.5805(b); 40 CFR 63, Subpart WWWW, Table 4, Condition 8]

- 2.30 The permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i) and General Provision 2 of this permit.

[40 CFR 63.5835(c)]

Monitoring and Recordkeeping Requirements

2.31 Material Usage Records

The permittee shall maintain records that contain, but is not limited to, the following information:

- the name and identification number for each gel-coat, resin, adhesive, catalyst, paint, promoter, styrene, and wax used

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- the percent by weight of each VOC in each compound
- gallons and pounds of gel-coat, resin, adhesive, catalyst, paint, promoter, styrene, and wax used
- the actual amount of hours spray coating occurred at the facility.

The most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.32 Styrene Emissions

The permittee shall calculate and record on a monthly basis the average hourly amount of styrene emitted per day from the facility utilizing the following method:

- For each product containing styrene, the permittee shall determine the weight percent content of styrene and the amount of that product used each day for each specific application method.
- The permittee shall then use the table in Appendix A to determine an emission factor for the product and associated application method. This procedure shall be followed for each product used in that application method in which that product is applied.
- The total facility styrene emissions shall then be calculated by summing the emissions for each product-method combination and dividing the emissions total by the number of actual hours the facility performed spray coating. An example of how this calculation is to be conducted is provided in Appendix A.

The permittee shall calculate and record the styrene emissions per consecutive 12-month period following the method described above.

The most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.33 VOC Emissions Determination Equation

- The permittee shall calculate and record on a monthly basis the average hourly VOC emission rate from the facility. Emissions shall be calculated using the following method:

$$VOC = \frac{\left(\sum_{i=1}^n (X_i * Y_i) \right)}{H}$$

Where:

VOC	=	Average hourly VOC emission rate (pounds per hour)
X _i	=	Weight of gel-coat, resin, styrene, paint or adhesive i used per month
Y _i	=	Weight percent VOC in gel-coat, resin, styrene paint, or adhesive i
H	=	Number of hours performing spray coating per month
n	=	Number of gel-coats, resins, styrenes, paints, and adhesives

- The permittee shall calculate and record on a monthly basis the annual VOC emission rate expressed as tons per any consecutive 12-month period, from the facility to demonstrate compliance with Permit Condition 2.2.

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$$VOC = \frac{\left(\sum_{i=1}^n (VOC_m)_i \right)}{2000}$$

Where:

VOC	=	VOC emissions rate (tons per year) per consecutive 12-month period
(VOC _m) _i	=	Monthly styrene emissions rate for month i
2000	=	Conversion factor from pounds to tons
n	=	Number of months (12)

2.34 Operations and Maintenance Manual for Dust Chamber

Within 60 days of issuance of this permit, the permittee shall have developed an Operations and Maintenance (O&M) Manual for the dust chamber. The manual will describe procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the air pollution control device. The manual shall include, but not be limited to, the following provisions:

- Inspect the filters weekly for collapse, and record date of inspection.
- Replace filters when collapsed or otherwise not functioning properly.
- Inspect the dust chamber weekly to ensure that it is reasonably tight, and record date of inspection.
- Remove accumulated particulate from the dust chamber weekly in such a manner that the particulate is not emitted into the ambient air, and record the date of particulate removal.
- Maintain negative air pressure inside the building.

2.35 Odor Management Plan

Within 60 days of issuance of this permit, the permittee shall have developed an Odor Management Plan for the facility. The plan shall describe procedures that will be followed to comply with Permit Condition 2.7. The plan shall include, but not be limited to, the following provisions:

- Maintain negative air pressure inside the building.
- Keep all storage containers and vessels closed when not in use.

2.36 Particulate Matter Performance Test

Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial start-up, the permittee shall conduct a performance test to measure PM and PM₁₀ emissions from Stacks EF-1, EF-2, and EF-3. The performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 6, and the following requirements:

- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.

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- The maximum number of spray booths shall be in operation during the performance test run. The number of spray booths in operation shall be recorded, as shall the materials used and throughput in pounds per hour (lb/hr).
- The permittee shall record the fuel-burning equipment in operation during the performance test that exhausts to Stacks EF-1, EF-2, and EF-3, if any.

2.37 Styrene Performance Test

Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial start-up, and at a frequency of no less than once every five years, the permittee shall conduct a performance test to measure styrene emissions from Stacks EF-1, EF-2, and EF-3. The performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 6, and the following requirements:

- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The maximum number of spray booths shall be in operation during the performance test run. The number of spray booths in operation shall be recorded, as shall the materials used, styrene content of each material, and material throughput in pounds per hour.

2.38 Visible Emissions Monitoring

The permittee shall conduct a quarterly (by calendar), facility-wide inspection of potential point sources of visible emissions during daylight hours and under normal operating conditions. There shall be a minimum of at least 60 days between each inspection. Unless visible emissions are present, no formal Method 9 visible emissions observation is required. If any visible emissions are present from any point of emission, the permittee shall either take corrective action within 24 hours to remedy the cause of the visible emissions, or conduct a Method 9 evaluation of the emissions using the procedures in IDAPA 58.01.01.625. If the corrective action does not eliminate the visible emissions, then a Method 9 visible emission observation shall be required.

If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance.

The permittee shall maintain records of the results of each visible emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time of each inspection, the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), and any corrective action taken. The most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

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2.39 Fugitive Dust Monitoring

The permittee shall conduct weekly facility-wide inspections of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken, and the date the corrective action was taken. The most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.40 Toxic Air Pollutant Emissions

At the end of each calendar month, the permittee shall determine the average hourly emissions per day of TAPs identified in IDAPA 58.01.01.585. At the end of each calendar month, the permittee shall determine the average hourly emissions per consecutive 12-month period of TAPs identified in IDAPA 58.01.01.586. If the average hourly emissions of an individual TAP exceeds the respective screening level identified in IDAPA 58.01.01.585 or .586, the permittee shall evaluate compliance with the acceptable ambient concentrations for non-carcinogens listed in IDAPA 58.01.01.585, or the acceptable ambient concentrations for carcinogens listed in IDAPA 58.01.01.586. These evaluations shall be included in the quarterly report submitted in accordance with Permit Condition 2.57.

- 2.41 Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

[40 CFR 63.5895(b)(1)]

- 2.42 The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities specified in 40 CFR 63, Subpart WWWW, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

[40 CFR 63.5895(b)(2)]

- 2.43 At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment.

[40 CFR 63.5895(b)(3)]

2.44 Determination Of Organic HAP Content Of Resins And Gel Coats

In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in Permit Conditions 2.45 through 2.46, as applicable.

[40 CFR 63.5797]

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- 2.45 The permittee shall include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
[40 CFR 63.5797(a)]
- 2.46 If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance.
[40 CFR 63.5797(b)]
- 2.47 If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than two percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by two percentage points or more, then the permittee must use the measured organic HAP content to determine compliance.
[40 CFR 63.5797(c)]
- 2.48 The permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
[40 CFR 63.5915(a)(1)]
- 2.49 The permittee must keep records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
[40 CFR 63.5915(a)(2)]
- 2.50 The permittee must keep records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2).
[40 CFR 63.5915(a)(3)]
- 2.51 The permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 of 40 CFR 63, Subpart WWWW, and Permit Condition 2.4.
[40 CFR 63.5915(c)]
- 2.52 The permittee must keep a certified statement that states the facility is in compliance with the work practice requirements of Permit Conditions 2.26 through 2.30, as applicable.
[40 CFR 63.5915(d)]
- 2.53 The permittee must keep, as specified in 40 CFR 63.10(b)(1), each record must kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
[40 CFR 63.5920(b)]

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- 2.54 The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years.

[40 CFR 63.5920(c)]

- 2.55 The permittee must keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

[40 CFR 63.5920(d)]

Reporting Requirements

2.56 Operations & Maintenance Manual and Odor Management Plan

Within 60 days of issuance of this permit, the permittee shall submit to DEQ, for approval, the O&M Manual and Odor Management Plan required in Permit Conditions 2.34 and 2.35, respectively.

2.57 Quarterly Reports

The permittee shall submit to DEQ a quarterly (by calendar) report that includes, but is not limited to, the following:

- the amount of gel-coat and resin used in tons for the quarter
- the styrene content of gel-coat used
- the weighted average styrene content of gel-coat and resin used
- calculated individual and total VOC average hourly emissions and emissions per consecutive 12-month period (including styrene, methylene chloride, and MEKP)
- actual amount of hours spray coating occurred at the facility
- average hourly TAP emissions

2.58 Performance Test Protocol

The permittee shall submit a test protocol for the performance tests required in Permit Conditions 2.36 and 2.37 to DEQ for approval at least 30 days prior to the test days.

2.59 Performance Test Report

The permittee shall submit a report of the results of the performance tests required in Permit Conditions 2.36 and 2.37, including all required process data, to DEQ within 30 days after the date on which the actual stack testing is concluded.

2.60 Permit Application Requirements

The permittee shall submit to DEQ a complete application for an original Tier I operating permit within 12 months of commencing operation.

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2.61 Reporting Permit Exceedance

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions.

2.62 Certification of Documents

All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

2.63 Initial Compliance Report

The permittee shall submit to DEQ an initial compliance report that demonstrates compliance with Permit Conditions 2.12 through 2.31 and 2.42 through 2.56 in accordance with Table 8 to Subpart WWW of Part 63. The permittee shall certify the compliance status with Permit Conditions 2.27 through 2.31 in accordance with Table 9 to Subpart WWW of Part 63

[40 CFR 63.5840; 40 CFR 63.5860]

2.64 Semiannual Report

The permittee shall submit to DEQ a semiannual report in accordance with 40 CFR 63.5910(b). The report must contain, but is not limited to, the following information:

[40 CFR 63.5910(b)]

2.64.1 Company name and address.

2.64.2 Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

2.64.3 Date of the report and beginning and ending dates of the reporting period.

2.64.4 If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in 40 CFR 63.10(d)(5)(i).

2.64.5 If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Permit Condition 2.26 through 2.30, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

[40 CFR 63.5910(c), (1)-(4)]

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2.65 For each deviation from an organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a continuous monitoring system to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in Permit Condition 2.64.1 through 2.64.4 and in Permit Condition 2.65.1 and 2.65.2. This includes periods of startup, shutdown, and malfunction.

2.65.1 The total operating time of each affected source during the reporting period.

2.65.2 Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.5910(d)(1), (2)]

2.66 Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

[40 CFR 63.5910(i)]

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3. APPENDIX A

Styrene Emissions Calculations

Unified Emission Factors for Open Molding of Composites

Provided by Composites Fabricators Association, dated July 23, 2001

Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

Application Process	Styrene content in resin/gelcoat, % ⁽¹⁾	<33 ⁽²⁾			33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 ⁽²⁾																		
	Manual	0.126 x % styrene x 2000																					83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	((0.286 x % styrene) - 0.0529) x 2000
	Manual with Vapor Suppressed Resin VSR ⁽³⁾	Manual emission factor [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))																																							
	Mechanical Atomized	0.169 x % styrene x 2000																					111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	((0.714 x % styrene) - 0.18) x 2000
	Mechanical Atomized with VSR ⁽³⁾	Mechanical Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																																							
	Mechanical Atomized Controlled Spray ⁽⁴⁾	0.130 x % styrene x 2000																					86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	0.77 x ((0.714 x % styrene) - 0.18) x 2000
	Mechanical Controlled Spray with VSR	Mechanical Atomized Controlled Spray emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																																							
	Mechanical Non-Atomized	0.107 x % styrene x 2000																					71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124	((0.157 x % styrene) - 0.0165) x 2000
	Mechanical Non-Atomized with VSR ⁽³⁾	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																																							
	Filament application	0.184 x % styrene x 2000																					122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215	((0.2746 x % styrene) - 0.0298) x 2000
	Filament application with VSR ⁽³⁾⁽⁵⁾	0.120 x % styrene x 2000																					79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140	0.65 x ((0.2746 x % styrene) - 0.0298) x 2000
	Gelcoat Application	0.445 x % styrene x 2000																					294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	((1.03646 x % styrene)- 0.195) x 2000
	Gelcoat Controlled Spray Application ⁽⁴⁾	0.325 x % styrene x 2000																					215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	0.73 x ((1.03646 x % styrene) - 0.195) x 2000
	Gelcoat Non-Atomized Application ⁽⁶⁾	SEE Note 7 below																					196	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	((0.4506 x % styrene) - 0.0505) x 2000
	Covered-Cure after Roll-Out	Non-VSR process emission factor [listed above] x (0.80 for Manual <or> 0.85 for Mechanical)																																							
	Styrene content in resin/ gel coat, % ⁽¹⁾	<33 ⁽²⁾	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 ⁽²⁾																				
Covered-Cure without Roll-Out	Non-VSR process emission factor [listed above] x (0.50 for Manual <or> 0.55 for Mechanical)																																								

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Notes

- 1 Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass, etc.
- 2 Formulas for materials with styrene content < 33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content > 50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
- 3 The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the *CFA Vapor Suppressant Effectiveness Test*.
- 4 SEE the *CFA Controlled Spray Handbook* for a detailed description of the controlled spray procedures.
- 5 The effect of vapor suppressants on emissions from filament winding operations is based on the *Dow Filament Winding Emissions Study*.
- 6 SEE the July 17, 2001 EECS report *Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites* for a detailed description of the non-atomized gel coat testing.
- 7 Use the equation $((0.4506 \times \% \text{ styrene}) - 0.0505) \times 2000$ for gel coats with styrene contents between 19% and 32% by wt.;
Use the equation $0.185 \times \% \text{ styrene} \times 2000$ for gel coats with less than 19% styrene content by wt.

Percentage Emission

1. Select Resin Styrene Content (% wt Styrene Monomer)
2. Select application method
3. Select Non-Vapor Suppressed or Vapor Suppressed
4. Find factor in table

Example:

Resin styrene content = 40%
Mechanical Atomized
Non-Vapor Suppressed
Emissions factor = 211 pounds styrene per 2,000 pounds resin/gel coat processed

Emissions Calculation

Resin wt. x Emissions Factor = Emissions wt.

Example:

1000 lbs. Resin x 211 pounds styrene/2,000 pounds resin/gel coat = 105.5 lbs.
Emissions

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4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;

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- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.